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Pro Querente

**IN THE FOURTH JUDICIAL DISTRICT COURT OF MONTANA
MISSOULA COUNTY**

**STEVE NELSON, MICHAEL
BOEHM and BONNER PROPERTY
DEVELOPMENT, LLC,**

Plaintiffs,
vs.

**PROJECT SPOKANE, LLC, and
SEAN WALSH,**

Defendants.

Cause No. **DV-32-2020-0000604-OC**
Dept. No. 1

**NOTICE OF MONTANA UNIFORM
DISTRICT COURT RULE 3
COMPLIANCE**

1. Undersigned counsel hereby certifies, pursuant to Montana Uniform District Court Rule 3, that he has contacted and given reasonable notice of the time and place of the *ex parte* motion for temporary restraining order, the substance of the order sought, and whether Defendant opposes the motion.

2. Specifically, undersigned counsel contacted Defendant Sean Walsh and Defendant Project Spokane, LLC's principal (Sean Walsh), through the defendants' counsel, Peter Ito, Ito Law Group, 1550 Larimer Street, Suite 667, Denver, Colorado, 80202, (720) 281-5294, peter@itolawgroup.com, on May 31, 2020, via email, at 8:39 p.m. (See Exhibit A, attached.) The email included a draft copy of the Brief in Support of the Motion for Temporary Restraining Order and Preliminary Injunction and the proposed Temporary Restraining Order and Order to Show Cause. The email also informed Mr. Ito of Plaintiffs' intent to file the motion as soon as possible.

3. Neither Mr. Ito nor any of the defendants have responded to the email as of this filing.

DATED this 1st day of June 2020.

Respectfully Submitted,
RHOADES SIEFERT & ERICKSON PLLC

By: /s/Quentin M. Rhoades

Quentin M. Rhoades
Robert Erickson
Pro Querente

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of June 2020, I served a true and correct copy of the foregoing on the following persons by depositing said copy overnight delivery by FedEx, prepaid, and by email, addressed as follows:

Peter Ito
Ito Law Group
1550 Larimer Street, Suite 667
Denver, CO 80202
peter@itolawgroup.com

By: /s/ Quentin M. Rhoades
Quentin M. Rhoades

From: [Quentin.Rhoades](#)
To: peter@itolawgroup.com
Cc: [Robert.Erickson](#); [Nancy Knilans](#)
Subject: Nelson et al. v. Walsh et al.
Date: Sunday, May 31, 2020 8:39:55 PM
Attachments: [image001.png](#)
[2020 05 31 BIS RE Motion for TRO - FINAL DRAFT.pdf](#)
Importance: High

Counsel,

The law firm of Rhoades Siefert & Erickson, PLLC, represents the plaintiffs listed on the caption of the attached draft brief. The attachment consists of a final draft brief in support of a motion for a TRO enjoining the public sale discussed therein. Tomorrow morning, we will present to the court a request for a TRO on an ex parte basis. May we represent your client's consent to the motion? If not, we will be duty bound to report to the court your client's position, and any arguments you may wish to convey to us in support of your clients' position. Please acknowledge and respond. Thank you.

Quentin M. Rhoades, Esq.

406.721.9700 montanalawyer.com

CONFIDENTIALITY NOTICE: This communication is confidential and subject to attorney/client privilege. If you received this communication in error, please immediately notify the sender and destroy all copies (electronic or otherwise).

CERTIFICATE OF SERVICE

I, Quentin M. Rhoades, hereby certify that I have served true and accurate copies of the foregoing Notice - Notice to the following on 06-01-2020:

Project Spokane, LLC (Defendant)
365-B Clinton Street
Costa Meas 92626
Service Method: Email

Sean Walsh (Defendant)
365-B Clinton Street
Costa Mesa 92626
Service Method: Email

Electronically Signed By: Quentin M. Rhoades
Dated: 06-01-2020